

**Exhibit B**

**[Proposed] Order**

Jason A. McNeill (9711)  
[mcneill@mvmlegal.com](mailto:mcneill@mvmlegal.com)  
 Eric K. Schnibbe (8463)  
[schnibbe@mvmlegal.com](mailto:schnibbe@mvmlegal.com)  
**MCNEILL | VON MAACK**  
 236 South 300 East  
 Salt Lake City, Utah 84111  
 Telephone: 801.823.6464

Jessica B. Magee (*admitted pro hac vice*)  
[jessica.magee@hklaw.com](mailto:jessica.magee@hklaw.com)  
 Andrew W. Balthazor (*admitted pro hac vice*)  
[andrew.balthazor@hklaw.com](mailto:andrew.balthazor@hklaw.com)  
**HOLLAND & KNIGHT**  
 1722 Routh Street, Suite 1500  
 Dallas, Texas 75201  
 Telephone: 214.969.1700

Attorneys for Josias N. Dewey, Court-Appointed  
 Temporary Receiver

---

**IN THE UNITED STATES DISTRICT COURT  
 DISTRICT OF UTAH, NORTHERN DIVISION**

---

**SECURITIES AND EXCHANGE  
 COMMISSION,**

**Plaintiff,**

**v.**

**DIGITAL LICENSING INC. (d/b/a “DEBT  
 Box”), a Wyoming corporation; JASON R.  
 ANDERSON, an individual; JACOB S.  
 ANDERSON, an individual; SCHAD E.  
 BRANNON, an individual; ROYDON B.  
 NELSON, an individual; JAMES E.  
 FRANKLIN, an individual; WESTERN OIL  
 EXPLORATION COMPANY, INC., a Nevada  
 corporation; RYAN BOWEN, an individual;  
 IX GLOBAL, LLC, a Utah limited liability  
 company; JOSEPH A. MARTINEZ, an  
 individual; BENJAMIN F. DANIELS, an  
 individual; MARK W. SCHULER, an  
 individual; B & B INVESTMENT GROUP,  
 LLC (d/b/a “CORE 1 CRYPTO”), a Utah  
 limited liability company; TRAVIS A.  
 FLAHERTY, an individual; ALTON O.  
 PARKER, an individual; BW HOLDINGS,  
 LLC (d/b/a the “FAIR PROJECT”), a Utah  
 limited liability company; BRENDAN J.  
 STANGIS, an individual; and MATTHEW D.  
 FRITZSCHE, an individual,**

**Defendants,**

**ARCHER DRILLING, LLC, a Wyoming  
 limited liability company; BUSINESS  
 FUNDING SOLUTIONS, LLC, a Utah limited  
 liability company; BLOX LENDING, LLC, a**

**[PROPOSED] ORDER GRANTING  
 RECEIVER’S FIRST AND FINAL FEE  
 APPLICATION**

**Case No. 2:23-cv-00482-RJS**

**Judge Robert J. Shelby**

**Magistrate Judge Dustin B. Pead**

Utah limited liability company; CALMFRITZ HOLDINGS, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

**Relief Defendants.**

This matter before the Court is the motion submitted by Josias N. Dewey, the Court Appointed Temporary Receiver of Digital Licensing, Inc. and its subsidiaries and affiliates (the “Receiver”), requesting that the Court, on a final basis, (1) approve the Receivership Team’s<sup>1</sup> fees and costs identified therein; and (2) order the United States Securities and Exchange Commission (“Commission”) to pay the fees and costs in full pursuant to the Court’s March 18, 2024 Memorandum Decision and Order (ECF No. 275) (altogether the “Application”).

In support of the Application, the Receiver submitted the following Declarations and Exhibits:

<b>Declaration</b>	Declaration of Jessica Magee on behalf of H&K
<b>Declaration</b>	Declaration of Jesse M. Daves on behalf of BDO
<b>Declaration</b>	Declaration of Jason McNeill on behalf of MVM
<b>Declaration</b>	Declaration of Becky McGee
<b>Exhibit A</b>	SFAR Report
<b>Exhibit B</b>	[Proposed] Order
<b>Exhibit C</b>	Summary of H&K Fees by Professional
<b>Exhibit C-1</b>	Summary of H&K Work and Discounts by Timekeeper and Attorney Category
<b>Exhibit D</b>	Summary of H&K Fees by Activity Category
<b>Exhibit E</b>	H&K’s Daily Time Records
<b>Exhibit F</b>	Summary of Costs and Expenses to the Receivership Estate
<b>Exhibit F-1</b>	H&K’s Reimbursable Expense Detail for Application Period
<b>Exhibit F-2</b>	Summary of Services Provided by BDO and its Daily Time Records

<sup>1</sup> Any capitalized terms not defined herein shall take the meaning prescribed to them in the Application.

<b>Exhibit F-3</b>	Summary of Services Provided by MVM and its Daily Time Records
<b>Exhibit F-4</b>	Summary of Services Provided by Becky McGee and her Daily Time Records

The Court has reviewed the Application, all Declarations and Exhibits, the record in this case, and applicable law. The Court finds that the Receivership Team's fees and expenses are reasonable, necessary and have been beneficial to the Receivership Estate and should be allowed in full. Based thereon, and for good cause appearing, **IT IS HEREBY ORDERED** that:

1. The Application is **GRANTED** in all respects;
2. The Receivership Team's fees and expenses over the Application Period are reasonable and **APPROVED**, on a final basis, in the total amount of \$746,941.86 ("Fees"), and more specifically identified as: (i) \$456,337.16 for H&K and the Receiver; (ii) \$264,330.90 for BDO; (iii) \$18,689.80 for MVM; and (iv) \$7,584.00 for Ms. McGee.
3. The Commission shall pay the Fees and are immediately **ORDERED** to remit payment of the Fees amount to H&K.

IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
ROBERT J. SHELBY

United States Chief District Judge

Presented by:

Jason A. McNeill

Eric K. Schnibbe

**MCNEILL | VON MAACK**

236 South 300 East

Salt Lake City, Utah 84111

Telephone: 801.823.6464

Jessica B. Magee

Andrew W. Balthazor

**HOLLAND & KNIGHT LLP**

701 Brickell Ave., Suite 3300

Miami, FL 33131

Telephone: 305.789.7584

*Attorneys for Josias N. Dewey,  
Court-Appointed Temporary Receiver*